

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND  
Northern Division**

IN RE GRACE OCEAN PRIVATE  
LIMITED, *et al.*,  
Petitioners.

Civil Action No. 24-cv-000941-JKB  
IN ADMIRALTY

---

**MOTION OF CERTAIN NONPARTY DALI CREWMEMBERS TO SEAL  
OBJECTIONS TO MAGISTRATE JUDGE DECISIONS ON MOTION TO  
STRIKE CONFIDENTIALITY DESIGNATIONS AND MOTIONS TO SEAL**

Pursuant to Local Rule 105.11 and Paragraph 9 of this Court's protective order (ECF No. 474), certain nonparty deponents ("Objectors")<sup>1</sup> hereby move to seal the unredacted version of their joint Objections to the Magistrate Judge's decision at ECF No. 624, and in support thereof state:

1. Objectors designated portions of their deposition transcripts as "confidential" within the meaning of the protective order in this case. Claimants contested those designations through a motion to strike (ECF No. 513). Magistrate Judge Sullivan issued an opinion and order on the motion to strike and on related motions to seal (ECF No. 624). Judge Sullivan's opinion is under seal, and it retains the seal over relevant sealed papers during the pendency of any appeal from his order.
2. The essential question before the Court is whether certain information should remain protected from disclosure, including on the public docket. To preserve the status quo pending resolution of the motion to strike, the parties necessarily needed to seal significant portions of the motion papers that reveal the content of the sealed information

---

<sup>1</sup> The Objectors (and movants here) are: Karthikeyan Deenadayalan; Chandrashekhar Sabhapathy; Chaminda Kariyawasam; Ganeshkumar Subramanian; and Nishanth Pitchaiah.

and the grounds therefor. The same reasoning applies during appeal from the Magistrate Judge's decision.

3. Objectors have prepared and will file a public version of their Objections that does not reveal information Objectors contend is protected.
4. On October 27, 2025, Objectors sent their proposed redactions from the Objections to a group of Claimants' counsel. Given their position on the motion to strike, Claimants can be expected to disagree that the Objections contain information that should be protected. As to interim sealing of the designated portions of the Objections, as of this writing, a couple of Claimants' counsel have stated they do not have an issue with Objectors' proposed redactions and none have stated that they do, but given the short time frame and the large number of Claimants' counsel, many have not yet responded.

Wherefore, Objectors respectfully requests that the motion to seal be granted.

Dated: October 28, 2025

/s/ Marshall N. Perkins  
Joseph T. Mallon, Jr. (#22878)  
Marshall N. Perkins (#25514)  
MALLON LLC  
300 E. Lombard St. Suite 815  
Baltimore, MD 21202  
Tel: 410 727 7887/Fax 410 727 4770  
jmallon@mallonllc.com  
mperkins@mallonllc.com

*Attorneys for Nonparty Objectors*  
*Chandrashekhar Sabhapathy, Chaminda*  
*Kariyawasam, Ganeshkumar*  
*Subramanian, and Nishanth Pitchaiah*

Brian McCarthy (*pro hac vice*)  
ABRAMS FENSTERMAN, LLP  
3 Dakota Drive Suite 300  
Lake Success, New York 11042  
Tel: 516 328 2300/Fax: 516 328 6638  
bmccarthy@abramslaw.com

*Attorneys for Nonparty Objector*  
*Chandrashekhar Sabhapathy*

Michael K. Twersky (*pro hac vice*)  
FOX ROTHSCHILD LLP  
980 Jolly Road, Suite 110  
Blue Bell, PA 19422  
Tel: 215 299 2923/Fax: 267 254 0242  
mtwersky@foxrothschild.com

*Attorneys for Nonparty Objector*  
*Chaminda Kariyawasam*

Respectfully submitted,

/s/ Gregg L. Bernstein  
Gregg L. Bernstein (#01340)  
John J. Connolly (#09537)  
ZUCKERMAN SPAEDER LLP  
100 E. Pratt St., Suite 2440  
Baltimore, Maryland 21202  
Tel: 410 332 0444 / Fax: 410 659 0436  
gbernstein@zuckerman.com  
jconnolly@zuckerman.com

*Attorneys for Nonparty Objector*  
*Karthikeyan Deenadayalan*

Owen F. Duffy (*pro hac vice*)  
LAW OFFICE OF OWEN DUFFY  
P.O. Box 919  
Point Lookout, New York 11569  
Tel: 516 721 8793  
owen@oduffy-law.com

*Attorneys for Nonparty Objectors*  
*Ganeshkumar Subramanian and*  
*Nishanth Pitchaiah*

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 28th day of October, 2025, I caused copies of the foregoing document to be served through the ECF system on all registered counsel of record.

/s/ *John J. Connolly*  
John J. Connolly (09537)